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VIA ECF

Honorable Frederick Block
Senior U.S. District Court Judge
U.S. District Court for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Teamsters, Local 804, et al. v. The City of New York, et al.
Civil Action No. 24-08683 (FB-TAM)

Dear Judge Block:

We are labor counsel for Amazon.com, Inc. ("Amazon"). Amazon operates "JFK8", a fulfillment center, and "DBK4", a delivery station, both of which are central to Plaintiffs' claims in the above-referenced action.

Plaintiffs contend that various Teamster local unions are the exclusive bargaining representative of workers at the JFK8 facility and among various groups of workers at DBK4, claims Amazon disputes. In an effort to force Amazon to recognize and bargain with the Teamsters, Plaintiffs have taken to picketing and other demonstrations at Amazon sites throughout the country. These actions have included engaging in the unlawful activity of blocking ingress and egress to and from Amazon's operating facilities, among other unlawful acts.

DBK4 and JFK8, specifically, have been sites targeted by Plaintiffs, requiring the assistance of Defendant New York Police Department ("NYPD") in maintaining order. Plaintiffs contend that the NYPD's actions "unreasonably interfered" with their protests.

While Amazon is not a party to this action, it has a vested interest in protecting its property rights, as well as its ability to conduct its business, and Plaintiffs, through this action, seek to deny and/or diminish those rights. Amazon's interests may not be adequately known or protected by Defendants, whose primary focus is public safety. Accordingly, we seek to intervene in this action pursuant to Rule 24 of the Federal Rules.



Honorable Frederick Block
December 23, 2024
Page 2

Pursuant to Your Honor's Individual Motion Practices & Rules, we request a pre-motion conference and stand ready to provide any additional information required for the Court's consideration of this request.

Very truly yours,

SEYFARTH SHAW LLP

/s/ Victoria Vitarelli

Victoria Vitarelli

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